IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : DATE FILED_____

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v. : CRIMINAL NO. 03-____

:

JARRELL JONES, : VIOLATIONS:

a/k/a JARRELL KOGER : 21 U.S.C. § 841(a)(1) (Possession with

intent to distribute cocaine base (crack) -

2 counts)

: 21 U.S.C. § 841(a)(1) (Possession with

intent to distribute cocaine - 1 count)

21 U.S.C. § 860 (Possession with intent to

distribute cocaine base (crack) and cocaine within 1000 feet of a school-

2 counts)

: 18 U.S.C. 924(c) (Possession of firearms in

furtherance of drug trafficking - 1 count)

: Notice of Forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about August 22, 2001, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JARRELL JONES, a/k/a JARRELL KOGER,

knowingly and intentionally possessed with intent to distribute, and aided and abetted and the possession with intent to distribute of, more than 50 grams, that is approximately 229 grams, of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 22, 2001, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JARRELL JONES, a/k/a JARRELL KOGER,

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute, of more than 50 grams, that is approximately 229 grams, of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance, within 1000 feet of the real property comprising the Eliza B. Kirkbride Elementary School, a public elementary school located at 1501 South 7th St, Philadelphia, Pennsylvania. in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A). In violation of Title 21, United States Code, Section 860.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 22, 2001, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JARRELL JONES, a/k/a JARRELL KOGER,

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, approximately 260 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 22, 2001, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JARRELL JONES, a/k/a JARRELL KOGER,

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, approximately 260 grams of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance, within 1000 feet of the real property comprising the Eliza B. Kirkbride Elementary School, a public elementary school located at 1501 South 7th St, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 860.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 22, 2001, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JARRELL JONES, a/k/a JARRELL KOGER,

knowingly and intentionally possessed the following firearms in furtherance of drug trafficking crimes for which he may be prosecuted in a court of the United states, that is possession with intent to distribute cocaine and cocaine base (crack) and possession with intent to distribute cocaine and cocaine base (crack) within 1000 feet of a school, as charged in Counts One through Four of the Indictment:

- (1) a Ruger P90DC .45 caliber semi-automatic handgun, serial number 66070627, loaded with 7 rounds;
- (2) a Witness 9 mm semi-automatic handgun with an obliterated serial number loaded with 13 rounds;
- (3) a Highpoint 9 mm semi-automatic handgun with a laser sight, serial number P211830; and
 - (4) a Smith and Wesson .38 Special, serial number 3K88655, loaded with 5 rounds. In violation of Title 18, United States Code, Section 924(c).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 4, 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JARRELL JONES, a/k/a JARRELL KOGER,

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, more than 5 grams, that is approximately 19 grams, of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT SEVEN

THE GRAND JURY CHARGES THAT:

On or about June 4, 2002, at Philadelphia, in the Eastern District of Pennsylvania, defendant

JARRELL JONES, a/k/a JARRELL KOGER,

knowingly and intentionally possessed with intent to distribute, and aided and abetted the possession with intent to distribute of, more than 5 grams, that is approximately 19 grams, of a mixture or substance containing a detectable amount of cocaine base (crack), a Schedule II controlled substance, within 1000 feet of the real property comprising the South Philadelphia High School, a public high school located at 2101 South Broad Street, Philadelphia, Pennsylvania, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

In violation of Title 21, United States Code, Section 860.

NOTICE OF FORFEITURE

As a result of the violations of Title 18, United States Code, Section 924(c), set forth in Count Five of this Indictment, the defendant

JARRELL JONES, a/k/a JARRELL KOGER,

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), all firearms and ammunition involved in the commission of this offense, including, but not limited to:

- (A) a Ruger P90DC .45 caliber semi-automatic handgun, serial number 66070627, loaded with 7 rounds;
- (B) a Witness 9 mm semi-automatic handgun with an obliterated serial number loaded with 13 rounds;
- (C) a Highpoint 9 mm semi-automatic handgun with a laser sight, serial number P211830; and
 - (D) a Smith and Wesson .38 Special, serial number 3K88655, loaded with 5 rounds.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 924(d).

A TRUE BILL
GRAND JURY FOREPERSON

PATRICK L. MEEHAN United States Attorney